

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES LIABILITY)	
INSURANCE CO., INC., AS)	
INSURER OF ADMINASERVICE,)	
INC.)	
)	
Plaintiff,)	
)	CIVIL ACTION NO. 04-11824 PBS
v.)	
)	
ADVANTIUS, INC., NEAL)	
BERGSTROM, ROBERT)	
STEVENS, CHARLES CAMBRA,)	
III, JONATHAN K. DRIGGS, AND)	
WORKFORCE SOLUTIONS, INC.,)	
)	
Defendants.)	

**MOTION TO REOPEN MATTER FOR THE PURPOSE OF ASSESSING DAMAGES
AGAINST DEFAULTED DEFENDANTS**

Now comes the plaintiff, United States Liability Insurance Co., as Insurer of Adminaservice, Inc. ("USLI" or "Plaintiff"), and moves the Court to reopen the above-entitled action for the sole purpose of allowing the Plaintiff to pursue assessment of damages against the defaulted defendants.

As grounds for this Motion, Plaintiff states the following:

1. On February 8, 2005, Charles Cambra, III and Jonathan K. Driggs were dismissed as defendants in the instant action.
2. On May 24, 2005, the Court granted Plaintiff's Motion for Default Judgment against the defendants Robert Stevens and Neal Bergstrom.
3. On June 16, 2005, the Court granted Plaintiff's Motion for Default Judgment against defendant Advantius, Inc.

4. On or about February 10, 2006, the plaintiff entered into a Stipulation of Dismissal with respect to the only remaining defendant, Workforce Solutions, Inc.
5. As a result of the above-mentioned events, the Court declared the instant action terminated on February 10, 2006.
6. As of the date of termination, Plaintiff had not yet had the opportunity to pursue assessment of damages against the defaulted defendants, Advantius, Inc., Robert Stevens and Neal Bergstrom.
7. At this time, Plaintiff would like to reopen the instant action in order to recover damages owed to it pursuant to the Court's above-mentioned judgments.

WHEREFORE, the plaintiff respectfully requests that the Court reopen this action for the limited purpose of allowing Plaintiff to file a motion for assessment of damages against the defaulted defendants.

**UNITED STATES LIABILITY INSURANCE
COMPANY, as insurer of ADMINASERVICE,
INC.,**

By Its Attorney,

/s/ Amy Cashore Mariani

Amy Cashore Mariani, Esq.

BBO# 630160

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 22, 2006.

/s/ Amy Cashore Mariani
Amy Cashore Mariani